

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 04-

v. : DATE FILED: _____

ERIK KYRIACOU : VIOLATIONS: Exporting technology without a
license (50 U.S.C. § 1705(b), 50
U.S.C. App. § 2410(b)(1) and 15
C.F.R. § 735.2(b)(1)-1 count)
Export and attempted export of
technology to a country under
embargo (50 U.S.C. § 1705(b), 18
U.S.C. § 2, 15 C.F.R.
§ 764.3(b)(2), and 31 C.F.R.
§ 560.204-1 count)
Interstate transportation of stolen
property (18 U.S.C. § 2314-1
count)
False Statement (18 U.S.C. § 1001)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about January 30, 2004, in the Eastern District of Pennsylvania and elsewhere,
defendant

ERIK KYRIACOU

did knowingly and willfully export and cause to be exported, four (4) Electrophysics Astroscope
lenses, Model 9300XL-3N, from the United States to a consignee in Vienna, Austria, without
first obtaining the required authorization from the Department of Commerce.

In violation of Title 50, United States Code, Section 1705(b), Title 50, United States
Code Appendix, Section 2403, and Title 15, Code of Federal Regulations, Sections 736.2 (b)(1).

and 774.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 30, 2004, in the Eastern District of Pennsylvania and elsewhere,
defendant

ERIK KYRIACOU

knowingly and willfully exported, caused to be exported, and attempted to export from the
United States goods, technology or services, specifically four (4) Electrophysics Astroscope
lenses, Model 9300XL-3N, to the Islamic Republic of Iran.

In violation of Title 50, United States Code, Section 1705(b), and Title 31, Code of
Federal Regulations, Section 560.204.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 30, 2004, in the Eastern District of Pennsylvania and elsewhere,
defendant

ERIK KYRIACOU

knowingly transported, transmitted, and transferred in foreign commerce, goods, wares,
securities, and merchandise of a value of \$5,000 or more, specifically one Electrophysics
Astroscope lens, Model 9300XL-3N, serial number 30008, valued at approximately \$8,000,
knowing the same to have been stolen, converted, and taken by fraud.

In violation of Title 18, United States Code, Section 2314.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 30, 2004, in the Eastern District of Pennsylvania and elsewhere,
defendant

ERIK KYRIACOU,

in a matter within the jurisdiction of the Bureau of Immigration and Customs Enforcement, did knowingly and willfully falsify, conceal, and cover up and cause to be falsified, concealed, and covered up, by a trick, scheme, and device a material fact, and made and caused to be made a materially false, fictitious and fraudulent statement and representation and made and caused to be made and used a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent entry, by creating and maintaining for inspection by the Bureau of Immigration and Customs Enforcement a false and fictitious Shipper's Export Declaration (SED) which falsely concealed the export of four (4) Electrophysics Astroscope lenses, Model 9300XL-3N, from the United States to Vienna, Austria, and which further concealed the intended transshipment to the Islamic Republic of Iran.

In violation of Title 18, United States Code, Section 1001(a).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney